

April 12, 2010

RECEIVED

Mr. John Noonan
California Regional Water Quality Control Board
1685 E Street
Fresno, California 93706

APR 15 2010

RECEIVED
FRESNO, CALIF.

Re: Former Champion's Property Located at
2696 South Maple Ave., Fresno, California

Dear Mr. Noonan;

On behalf of Fresno Business Park, LLC (FBP), SLR International Corp. (SLR) is pleased to submit the following Remedial Action Plan (RAP) and estimate of the associated project costs. This RAP is prepared solely based on the review of the letter report by Environ, dated March 16, 2006, the letter report by Krazan and Associates, Inc. dated October 5, 2004 and our conference call on March 17th, 2010.

BACKGROUND

The referenced property is a 14 acre parcel of land developed with a single story industrial building approximately 130,000 square feet, with additional outside yard storage areas. Currently the referenced property is in bankruptcy court. FBP is interested in purchasing the property, however in light of the current physical, structural and the environmental condition of the property and future liabilities associated with the environmental condition, specifically unquantified liabilities associated with the groundwater contamination, the said transaction is not economically feasible.

California Regional Water Quality Control Board (CRWQCB) has accepted a proposal from FBP, as future owners of the property, to spend upto \$500,000 to improve the environmental quality of the property. The first priority will be the soil remediation of the areas identified in the above mentioned reports.

The two reports outline the findings from a soil gas survey investigation within the building. The impacted area appears to be approximately 240 square feet in size (please see Figure 1) inside the building and former location of the Aboveground Storage Tanks (ASTs) located

outside, at the north east corner of the building. The primary chemicals of concern (COC) identified are, 1,1-Dichloroethene (1,1-DCE), 1,1-Dichloroethane (1,1,-DCA), 1,1,1-Trichloroethane (1,1,1-TCA).

PROPOSED REMEDIAL ACTION PLAN

The proposed RAP would consist of the installation, operation, and removal of a Soil Vapor Extraction (SVE) system to treat the Volatile Organic Compounds (VOCs) in soil at the property. Neither groundwater assessment nor groundwater remediation would be conducted. The SVE system would use vertically installed SVE wells connected to a single SVE blower to capture and treat soil vapors. The components of the system are described below.

Soil Vapor Extraction Well Installation

Soil below the subject property is characterized by a series of assessment activities as primarily sand. Soil vapor extraction (SVE) remediation technology is proposed for the treatment of soil from surface to the groundwater at a depth of approximately 75 feet below ground surface (bgs). It is estimated that the radius of subsurface vacuum influence that could be achieved by SVE technology in sandy soil would be approximately 50 to 75 feet. Figure 1 shows nine SVE wells that would be installed to a depth of 70 feet bgs at the impacted locations. An assumed radius of vacuum influence of 60 feet was used to provide coverage over the soil remediation area as shown in this figure. Actual locations could be adjusted based on field conditions, site features not shown on the attached figure and pilot testing results.

Each SVE well will be constructed with a 4-inch-diameter, schedule 40 PVC casing and screen (20 slot screen). The screen interval for each SVE well would be placed from 10 feet bgs to 70 feet bgs. The SVE wells will be completed at the ground surface with a flush-grade, traffic-rated, steel monument.

During well drilling activities, soil samples will be collected at 5 feet intervals. Select samples will be submitted to a certified laboratory for VOC analysis using EPA method 8260.

The soil cuttings will be temporarily stored on site in properly labeled, 55-gallon drums. The soil will be profiled for disposal and properly disposed of off-site.

Soil Vapor Extraction System Pilot Testing

Prior to installation of all the SVE wells, a one-day pilot test will be completed. Only one of the proposed SVE wells will be installed along with two temporary well points. The temporary well points will be installed to a depth of approximately 10 feet bgs. The well points will be installed at a distance of 20-feet and 40-feet from the one SVE well. A rental SVE blower will be connected to the SVE well and vacuum gauges will be installed to measure the subsurface

vacuum on the well points. The SVE blower will be started and the induced subsurface vacuum will be recorded. The blower will be operated for approximately four to six hours and during that time, the applied vacuum level will be changed. The flow rate from the SVE blower will be measured with each change in the applied vacuum level. The concentration of volatile organic compounds (VOCs) will be measured with a handheld instrument during the pilot test and two vapor samples will be collected during the test for laboratory analysis. Test results will be reviewed to assess if the assumed radius of influence for the SVE wells of 60 feet is adequate and to size the appropriate equipment for full-scale SVE system.

Soil Vapor Extraction System Installation

The SVE wells will be connected separately to an equipment enclosure via subsurface piping installed below the existing building floor slab. A contractor will saw-cut the existing floor slab, install 4-inch diameter PVC piping, backfill, and repair the floor slab. The approximate layout is shown on the attached figure 2. At the equipment enclosure, the individual connections from each SVE well will be plumbed to a common header pipe (manifold) that will be connected to the SVE equipment.

For the preliminary cost estimate, the SVE system is assumed to consist of a five horsepower (5-hp) SVE blower with a moisture knock-out tank. The effluent from the SVE blower will be plumbed to two 2,000 pound activated carbon units connected in series. The discharge from the activated carbon units will be directed to a discharge stack that is plumbed above the roofline of the adjacent building.

Electrical service will be connected to the SVE system and a control panel will be used for operation of the SVE blower. The SVE blower controls will include automatic shut-down if excess water accumulates in the knock-out tank, if the emergency shut-off switch is pressed, or if the SVE blower thermal control switches are activated.

Soil Vapor Extraction System Operation

For the preliminary cost estimate, it has been assumed that the SVE system will operate at a flow rate of approximately 180 cubic feet per minute (cfm) and that the vapor concentrations would start at approximately 50 parts per million (ppm). Further, it is anticipated that the vapor concentration will taper off to zero over a period of one year. The pilot testing (discussed above) will be used to verify the actual flow rate of the system and the anticipated concentration of VOCs in the extracted soil vapor. Based on these assumptions, it has been estimated that the eight carbon unit change-outs would occur during the one year of operation of the SVE system. During change-out, the carbon in the lead carbon unit would be replaced and the lag-carbon units switch with the lead units.

During the operation of the SVE system the vapor concentrations will be monitored on a monthly basis. The concentrations of VOCs in the extraction soil vapor, the concentration of VOCs between the two carbon units, and the concentration of VOCs in the discharge will be monitored on a monthly basis. The monitoring of vapor concentrations between the two units will be used to schedule the change-out of the lead carbon unit.

Soil Vapor Extraction System Closure Monitoring and Testing

It is anticipated that the SVE system will be operated for a period of one year. Once the concentration of VOCs in the extracted soil vapors have declined to a quasi steady state (asymptotic), the SVE system will be shut-down for a period of one-week, then the system will be restarted and the concentration of VOCs in the extracted soil vapors will be recorded. Then the concentration of VOCs in soil vapor from each SVE well will be measured using a handheld instrument. This measurement will be made by closing the valves that connect piping to all but one of the SVE wells, allowing the SVE system to extraction from one SVE well at a time. The results from this testing will be used to assess if the SVE system is still recovering sufficient VOCs from the subsurface to justify continued operation. A closure report will be submitted to the agency with a summary of system operation and the results of this closure testing. SLR will submit quarterly reports to CRWQCB, which will outline all field activities completed, measured data, discussion of progress made and recommendations. All supporting documents will be included as an attachment.

Soil Vapor Extraction System Closure and Removal

Closure of the SVE system will consist of the proper abandonment of the SVE wells and surface monuments, capping of the subsurface piping, removal of the surface piping/manifold, and removal of the SVE equipment. Photographic documentation will be collected to show removal of the system. A final closure report will be submitted to CRWQCB upon completion of all activities.

It should be noted that no changes and adjustments will be made to the systems either during the design phase or during the operation of the system without consent of the CRWQCB.

Estimated Cost

Table 1, attached outlines the estimated cost (\$415,000) for the entire project. It should be noted that this cost estimate is based on the assumption described within this proposal. The actual cost may vary based on completion of a pilot test. It is understood that, any sums of money remaining from the total of \$500,000 will be spent on addition projects on the property through

Mr. John Noonan

April 12, 2010

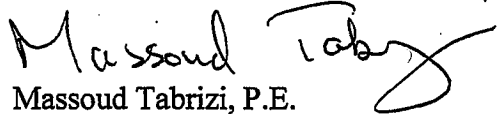
Page 5 of 5

SLR at the direction of CRWQCB. For any additional work requested by CRWQCB, SLR will prepare and submit a detailed proposal and a cost estimate for CRWQCB's final approval.

Please do not hesitate to contact me at (281) 591-6914 or (713) 906-3701 and mtabrizi@slrcorp.com, if you have any questions or if you need further information.

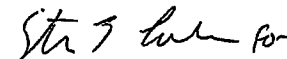
Sincerely,

SLR International Corp.



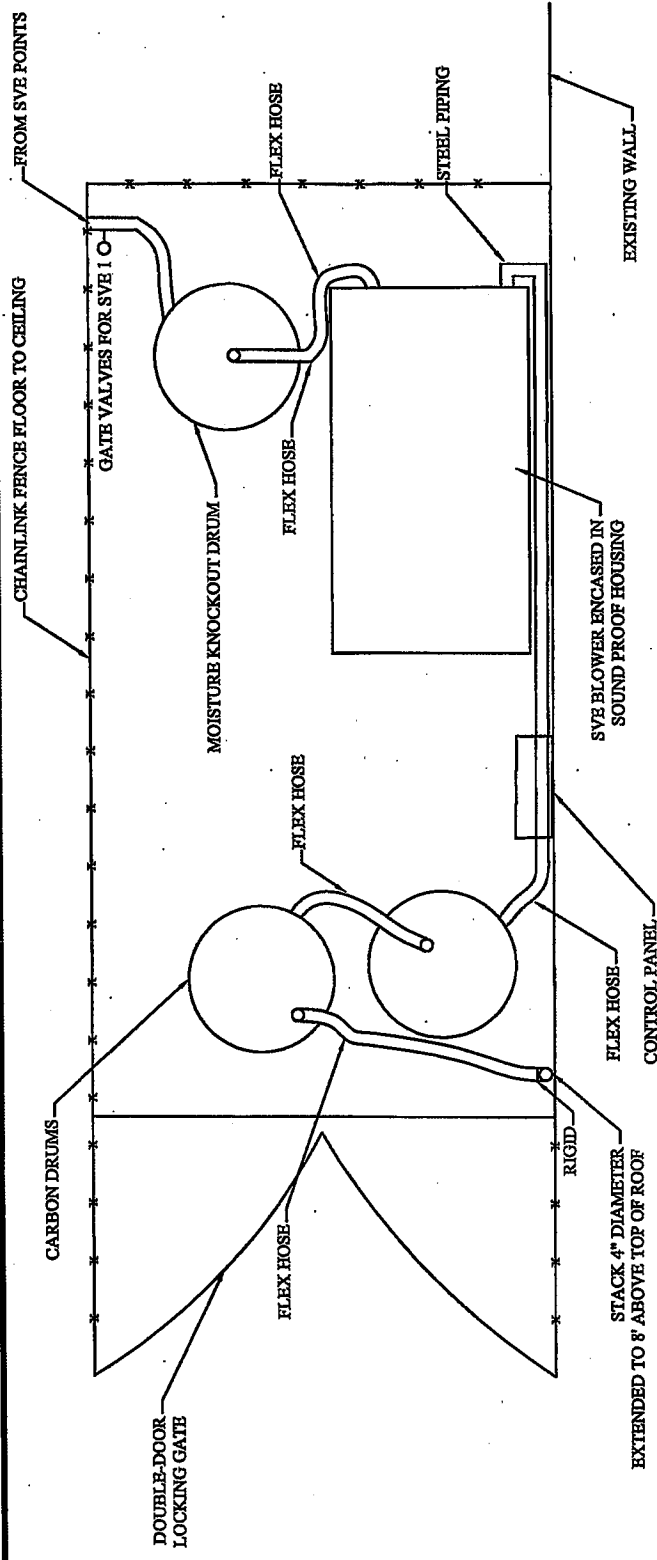
Massoud Tabrizi, P.E.

Managing Principal

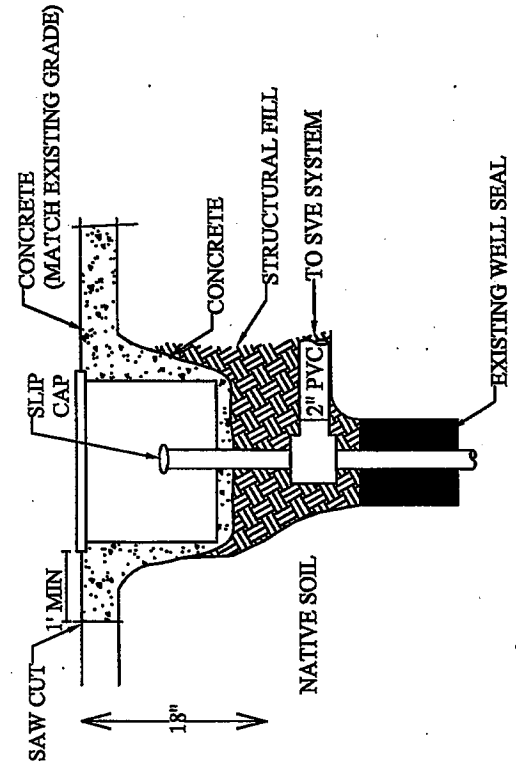


Scott Miller, P.E.

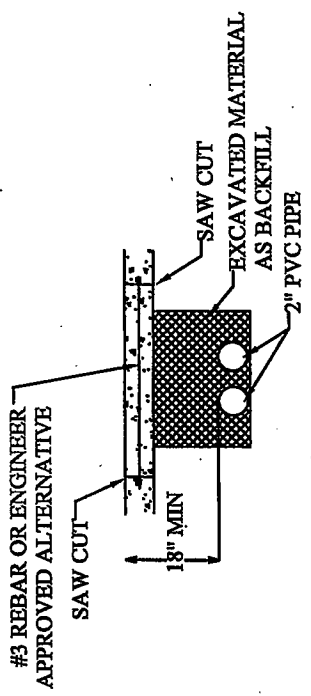
Principal Engineer



1 EXTRACTION/TREATMENT SYSTEM NOT TO SCALE



2 SOIL VAPOR EXTRACTION POINT VAULT NOT TO SCALE



3 TRENCH SECTION NOT TO SCALE

Report PROPOSAL-
2696 S. MAPLE
FRESNO, CALIFORNIA

Drawing SVE SYSTEM DETAILS

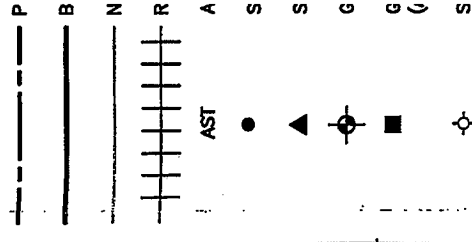
Date	April 14, 2010
File Name	DRAWING 2-2
Scale	AS SHOWN
Project No.	001.0311.00002

Figure No. 2

1. NOT TO SCALE. DO NOT USE THIS DRAWING FOR MATERIAL TAKE-OFFS OR ESTIMATES. THIS DRAWING IS A SCHEMATIC ONLY. THIS DRAWING IS INTENDED TO SHOW THE GENERAL CONNECTIONS AND GENERAL RELATION OF PROPOSED SYSTEM COMPONENTS.
2. NOT ALL PARTS OF EQUIPMENT COMPONENTS ARE SHOWN. THE CONTRACTOR SHALL FURNISH AND INSTALL ALL ITEMS NECESSARY TO COMPLETE A FULLY-FUNCTIONAL SYSTEM AS INTENDED. ALL ITEMS, ANCILLARY ITEMS, PLUMBING, FITTINGS AND FIXTURES SHALL BE INSTALLED IN ACCORDANCE WITH THE MANUFACTURERS RECOMMENDATIONS.



LEGEND

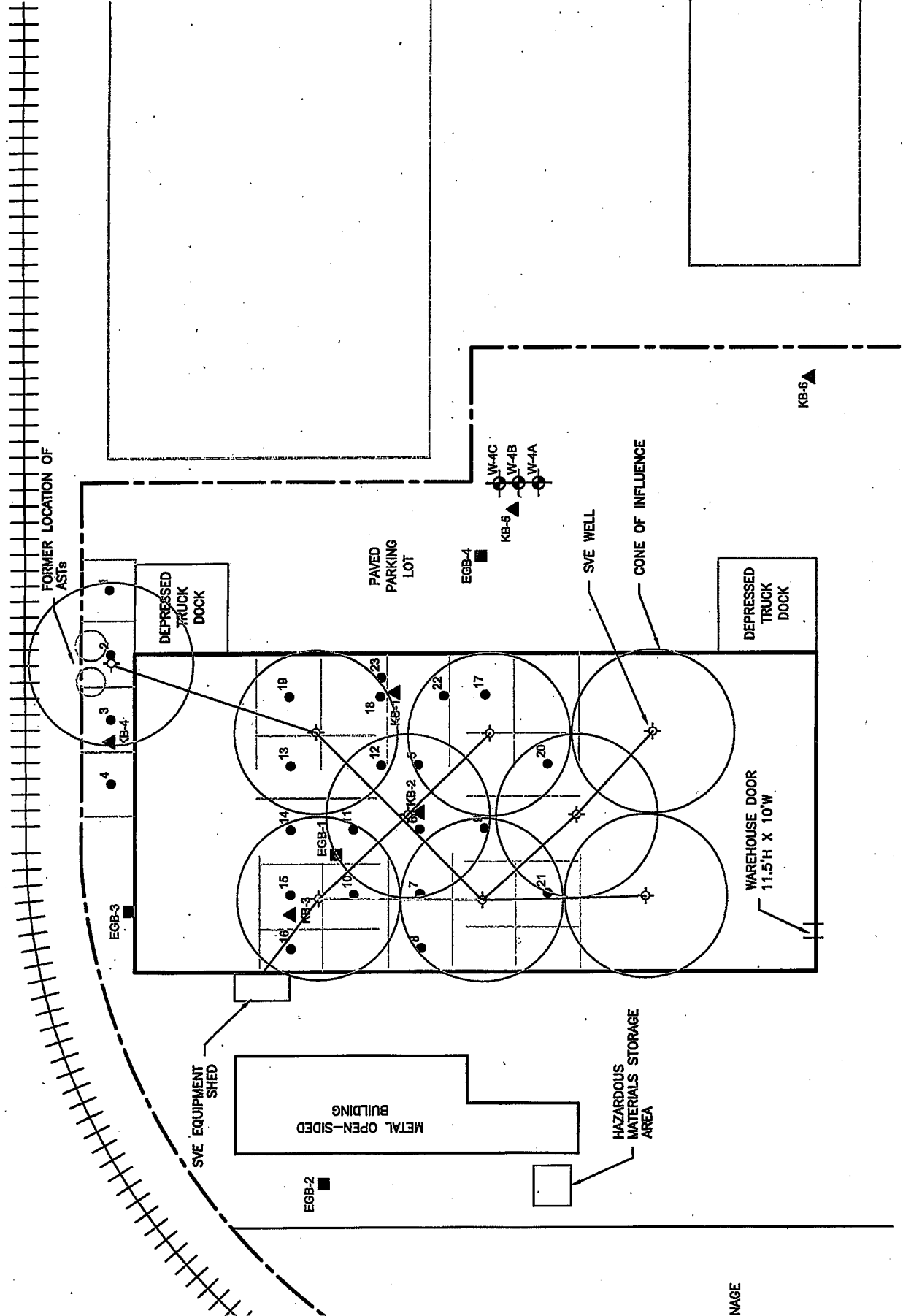


2696 S. MAPLE
FRESNO, CALIF

Report **PROPOSAL**

Drawing **PROPOSED**

Date April 14, 2010



NAGE

TABLE 1

- Remedy Components:**
- 1 Permitting
 - 2 Installation of nine soil vapor extraction (SVE) wells (4 inch diameter, hollow-stem auger) to 70 foot depth
 - 3 Pilot Testing (confirm radius of influence, concentrations, and flow-rate) - one day
 - 4 Install piping system, electrical service, equipment, control panel, carbon units, etc.
 - 5 Start-up and start-up testing
 - 6 SVE system operations and monitoring
 - 7 Closure testing, closure report, well abandonment, and equipment removal
- Primary Assumptions:**
- 1 Assumes SVE wells can be installed with hollow-stem auger drilling methods
 - 2 Assumes SVE flow rate is approximately 180 cfm at a vacuum level of around 10 to 20 inches water column
 - 3 Assumes SVE vapors will be treated with two, 2,000 pound carbon units connected in series
 - 4 Assumes one year of SVE system operation
 - 5 Assumes closure assessment consists of system shut-down and restarting to test "rebound" and vapor sampling from SVE wells.

Remedial Action Component	Units	No. of Units	Unit Cost	Cost	Total Cost
Permitting (Estimate)	Estimate	1	\$7,500	\$7,500	
Installation of SVE Wells with limited soil sampling	Estimate	9	\$3,000	\$27,000	
Disposal of soil from SVE Well installation	Cubic Yards	28.0	\$100	\$2,800	
Pilot Testing (one-day, rental equipment and generator)	Estimate	1	\$10,000	\$10,000	
					\$47,300
				Contingency 20%	\$9,500
					\$56,800
Soil Vapor Extraction Construction, Equipment Installation, and Start-up					
Final Design and Contractor Coordination	Estimate	1	\$10,000	\$10,000	
Electrical service connection permitting and installation	Estimate	1	\$5,000	\$5,000	
Subsurface Piping Installation (saw-cutting, excavation, piping, concrete repair)	Estimate	1	\$50,000	\$50,000	
Equipment					
SVE blower and moisture separator on skid	Estimate	1	\$10,000	\$10,000	
Carbon units (two 2,000 pound vapor units) furnish and install	Estimate	2	\$6,750	\$13,500	
Abovegrade plumbing, gauges, equipment placement	Estimate	1	\$5,000	\$5,000	
System Start-up, start-up testing, and as-built drawings	Estimate	1	\$4,000	\$4,000	
Construction Oversight	day	20	\$1,000	\$20,000	
					\$117,500
				Contingency 30%	\$35,300
					\$152,800
SVE System Operation and Monitoring (per year)					
Electrical Service (estimate 5 hp x 24 hrs/day)	Month	12	\$300	\$3,600	
Carbon unit change-out and disposal of spent carbon	Event	8	\$5,000	\$40,000	
Labor (monitoring visits and change-out visits)	Estimate	24	\$500	\$12,000	
Monthly Vapor Samples (VOCs) - influent, between units, effluent	Each	36	\$300	\$10,800	
Project Management, Coordination, and Oversight	Estimate	1	\$20,000	\$20,000	
					\$86,400
				Contingency 30%	\$30,200
					\$116,600
Regulatory Agency Interactions and Status Reports					
Status Reports	Estimate	4	\$2,500	\$10,000	
Agency oversight and closure review	Estimate	1	\$10,000	\$10,000	
					\$20,000
				Contingency 20%	\$4,000
					\$24,000
Closure Testing, Closure Report, and System Removal					
System shut-down, the restart with sampling (rebound testing)	Estimate	1	\$2,000	\$2,000	
Sampling of individual SVE wells for VOCs	Estimate	9	\$300	\$2,700	
Closure Report Preparation	Estimate	1	\$20,000	\$20,000	
SVE System Removal and SVE Well Removal					
SVE well removal (over drill)	Estimate	9	\$1,000	\$9,000	
Piping system cap and cover	Estimate	1	\$8,000	\$8,000	
Equipment removal and closure removal	Estimate	1	\$4,000	\$4,000	
Carbon unit removal - final disposal	Each	2	\$3,000	\$6,000	
					\$51,700
				Contingency 20%	\$15,500
					\$67,200

REMEDIAL ACTION ESTIMATED TOTAL (Rounded to nearest \$1,000) \$415,000

Year 1 value shown
 Net Present Value Summary SUM NPV: \$209,600 \$0 \$116,600 \$65,433 \$23,369 \$415,002

Year:	Construction (capital costs)	Monitoring	O&M	Closure	Agency
1:	\$209,600	\$0	\$116,600	\$0	\$0
2:	\$0	\$0	\$0	\$67,200	\$24,000
3:	\$0	\$0	\$0	\$0	\$0
4:	\$0	\$0	\$0	\$0	\$0
5:	\$0	\$0	\$0	\$0	\$0

Notes:
 Discount factor is calculated as 1/(1 + i)^t, where i is the real interest rate value of 2.7% (adjusted to remove expected inflation) and t is the number of years.
 OMB Circular No. A-94 (Executive office of the President, office of Management and Budget, and 2010 Discount Rates memo dated 12-8-2009)